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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Jacqueline Garcia,

Plaintiff,

v.

Eric S. Cohan, Stephanie Syptak-Ramnath,  
Antony Blinken,

Defendants.

Case No: 2:23-cv-00849-CDS-VCF

**Unopposed Motion for Extension of  
Time**

**(First Request)**

The Federal Defendants respectfully move for a 30-day extension of time, from August 4, 2023 to September 5, 2023, to file a response to Plaintiff's Complaint (ECF No. 1). This is the first request for an extension of time.

**MEMORANDUM OF POINTS AND AUTHORITIES**

Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1 allow a party to request additional time to perform an act. In this case, the Federal Defendants request additional time to file a response to the Complaint for the reasons set forth below.

Defense counsel has recently returned to the office from being on leave for family reasons. Defense counsel is awaiting information and file materials from the client agency, the Department of State. This extension of time is requested to allow undersigned counsel adequate time to receive and review relevant information to prepare a response to the

1 Complaint. Undersigned defense counsel has inquired with Plaintiff's counsel, who has no  
2 objection to this request for an extension of time. This motion is filed in good faith and not  
3 for the purposes of undue delay.

4 For the above reasons, the Federal Defendants respectfully request this extension of  
5 time, from August 4, 2023 to September 5, 2023, to file a response to Plaintiff's Complaint.

6 Respectfully submitted this 4th day of August 2023.

7 JASON M. FRIERSON  
8 United States Attorney

9 /s/ Patrick A. Rose  
10 PATRICK A. ROSE  
11 Assistant United States Attorney

12 **IT IS SO ORDERED**

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14  
15 **UNITED STATES MAGISTRATE JUDGE**

16 **DATED:** 8/4/23